

LAW OFFICE OF JOSEPH P. HOWARD, LLC

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Attorney for Plaintiff Courtney Griffin

COURTNEY GRIFFIN;
Plaintiff,

vs.

LAKEWOOD POLICE DEPARTMENT;

LAKEWOOD OFFICERS J. NOVAK, A PEDRE, J.

PREBISH, S. JONES, C. DIBIASE, W. ALLEN, J.

PRZEWOZNIK, C. ROSE; LAKEWOOD JOHN

DOE POLICE OFFICERS 1-10; LAKEWOOD

JOHN DOE POLICE LEADERSHIP 1-10;

LAKEWOOD JOHN DOE 911 OPERATORS 1-5.

Defendant

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
OCEAN COUNTY

DOCKET No.: *OCN-L-003235-21*

CIVIL RIGHTS COMPLAINT WITH
DEMAND FOR JURY

INTRODUCTION

Lakewood Police deprived Mr. Courtney Griffin of his civil rights when they pursued, detained, surrounded and fought with him in the street on the night of December 18th, 2019. At all times during the pedestrian stop, his fight with eight officers and his subsequent arrest, detention and interrogation, Mr. Griffin was denied his rights.

PARTIES

1. Courtney Griffin is a Lakewood resident with a residence at 38 Gabriella Court,

CIVIL RIGHTS COMPLAINT WITH DEMAND FOR JURY - 1

1 Manchester, New Jersey 08759.

- 2 2. At the time of the incident, the Central Policing Unit for Lakewood is the Lakewood
3 Township Police Department.
- 4 3. Police Officers at the scene of the incident are: J. Novak, A. Pedre, J. Prebish, S. Jones,
5 C. Dibiase, W. Allen, J. Przewoznik, and C. Rose.
- 6 4. Additional Police Officers (John Doe PO 1-10) are additional police officers involved in
7 the detention and / or arrest and / or interrogation of Mr. Griffin.
- 8 5. Police Leadership (John Does 1-10) were sergeants, lieutenants and captains of the
9 Lakewood Township Police Department responsible for leadership, control, training and
10 organization of the Police Force.
- 11 6. 911 Operators (John Does 1-5) were individuals assigned to the 911 unit on the day of
12 Mr. Griffin's arrest.
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16 **JURISDICTION**

- 17 7. Mr. Griffin is a resident of Ocean County. All of the facts related to the incident
18 described below occurred in Ocean County. The demand for redress of Civil Rights is
19 appropriately placed at the State Level in the Law Division of Superior Court.

20 **FACTS**

- 21 8. At the time of the incident, Mr. Griffin worked at Alpha Engineering, located at 651 New
22 Hampshire Avenue, Lakewood, New Jersey 08071, typically working a 12-hour shift
23 from 7 am to 7 pm.
- 24 9. Mr. Griffin took public transportation to work in the morning. After each work day Mr.
25 Griffin's mother would drive the family car to the factory and pick up Mr. Griffin.
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1 10. On December 18th, 2019 Mr. Griffin worked an hour of overtime, exiting the facility at
2 approximately 8:00pm.

3 11. Upon his exit, he realized his mother had left the factory, unaware of his end of shift
4 time.

5 12. It was very cold that evening, he had only a thin jacket, and he began to walk home in the
6 cold.

7 13. Unbeknownst to Mr. Griffin, a 911 operator took a call about a "black man" stalking a
8 "Jewish man" and brandishing a knife at about the time of Mr. Griffin's exit from Alpha
9 Engineering.
10

11 14. Police drove up rapidly on Mr. Griffin, frightening him and yelling at him. As he spoke
12 with the first officer on scene, many other police cars and officers came at him.

13 15. The police officers blocked off the street because there were so many cars reporting to
14 this particular scene.
15

16 16. An officer began yelling at Courtney that he had a knife and she needed to speak with
17 him.
18

19 17. Courtney denied having a knife. He told the officer he had just left his work and had a
20 box cutter.

21 18. Many other police officers entered the area and began surrounding Mr. Griffin.
22

23 19. The first officer ran at Mr. Griffin and pulled the box cutter from his pocket.

24 20. No officer attempted to defuse the escalating situation. Officers confronted Mr. Griffin
25 and he crouched back, prepared for a beating.

26 21. Mr. Griffin was tackled to the ground by Officer Pedre.

27 22. Mr. Griffin was taken to the station, questioned, ticketed for disorderly conduct and
28

1 released into his mother's care.

2 23. After much effort through counsel to obtain either bodycam or dashcam video of the
3 incident, the police department advised Mr. Griffin that NO such video existed for any of
4 the eight officers or any of the 4+ vehicles on scene.
5

6 **COUNT I**

7 **Violation of Mr. Griffin's 4th Amendment Rights**

8 24. Mr. Griffin relates all of the above pled allegations as part of this Count.

9 25. Mr. Griffin was targeted by multiple officers after a farcical 911 call related to the
10 stalking of a young Jewish man who, not surprisingly, was nowhere to be seen when Mr.
11 Griffin was stopped.
12

13 26. Mr. Griffin was subjected to a Stop and Frisk event despite no tangible evidence of any
14 stalking or otherwise criminal intent.

15 27. Mr. Griffin's 4th Amendment Rights were violated by this behavior.

16 WHEREFORE, Mr. Griffin asks the court to find in his favor and levy damages, special
17 damages, punitive damages, attorneys fees and any other remedy in equity or law as the
18 court sees fit.
19

20 **COUNT 2**

21 **Violation of Mr. Griffin's 14th Amendment Rights**

22 28. Mr. Griffin relates all of the above pled allegations as part of this Count.

23 29. Mr. Griffin was subjected to his initial stop due to his being targeted as a Black man in
24 downtown Lakewood.
25

26 30. Mr. Griffin was subjected to a Stop and Frisk event despite no tangible evidence of any
27 stalking or otherwise criminal intent.
28

1 31. Mr. Griffin's 4th Amendment Rights were violated by this behavior.

2 WHEREFORE, Mr. Griffin asks the court to find in his favor and levy damages, special
3 damages, punitive damages, attorneys fees and any other remedy in equity or law as the
4 court sees fit.
5

6 **COUNT 3**

7 **Violation of Mr. Griffin's State Law Against Discrimination LAD Rights**

8 32. Mr. Griffin relates all of the above pled allegations as part of this Count.

9 33. Mr. Griffin was targeted by multiple officers after a farcical 911 call related to the
10 stalking of a young Jewish man who, not surprisingly, was nowhere to be seen when Mr.
11 Griffin was stopped.
12

13 34. Mr. Griffin was subjected to his initial stop due to his being targeted as a Black man in
14 downtown Lakewood.

15 35. Mr. Griffin was subjected to a Stop and Frisk event despite no tangible evidence of any
16 stalking or otherwise criminal intent.
17

18 36. Mr. Griffin's 4th Amendment Rights were violated by this behavior.

19 WHEREFORE, Mr. Griffin asks the court to find in his favor and levy damages, special
20 damages, punitive damages, attorneys fees and any other remedy in equity or law as the
21 court sees fit.
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23
24 Respectfully submitted,

25 Dated: December 17th, 2021

26 /s/ Joseph P. Howard, Esquire
27 Joseph P. Howard, Esq., #040162010
28 Attorney for Plaintiff

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DEMAND FOR JURY TRIAL

The Plaintiffs demand a jury trial in this case.

Respectfully submitted,

Dated: December 17th, 2021

/s/ Joseph P. Howard, Esquire
Joseph P. Howard, Esq., #040162010
Attorney for Plaintiff

DESIGNATION OF TRIAL COUNSEL

Plaintiffs hereby designates Joseph P. Howard, Esq. as trial counsel.

Respectfully submitted,

Dated: December 17th, 2021

/s/ Joseph P. Howard, Esquire
Joseph P. Howard, Esq., #040162010
Attorney for Plaintiff

CERTIFICATION PURSUANT TO R. 4:5-1

The undersigned attorney for Plaintiff hereby certifies that the matter in controversy is not the subject of any other action or arbitration proceeding pending or contemplated, nor are there any other parties known to Plaintiff who should be joined in this proceeding.

Respectfully submitted,

Dated: December 17th, 2021

/s/ Joseph P. Howard, Esquire
Joseph P. Howard, Esq., #040162010
Attorney for Plaintiff